

EXHIBIT B

From: [Pace, Chris](#)
To: [Isaak, David](#); [Saathoff, Austin E.](#)
Cc: [Stancil, Paul](#); [Ram, Ashwin](#); [Stewart, Shontel](#); [Ramos, Christina](#); [Plasencia, Gabriela](#)
Subject: [EXTERNAL] RE: NFN8 Discovery
Date: Friday, November 8, 2024 1:24:56 AM
Attachments: [image002.png](#)

David, so that you are not waiting around unnecessarily today for a document or data production from us, we will not be producing any documents or data today. We do anticipate starting to produce documents and/or data at the start of next week. Thanks, Chris

Christopher R.J. Pace

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From: Isaak, David <disaak@steptoe.com>
Sent: Wednesday, November 6, 2024 6:18 PM
To: Pace, Chris <CRJPace@winston.com>; Saathoff, Austin E. <ASaathoff@winston.com>
Cc: Stancil, Paul <pstancil@steptoe.com>; Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; Ramos, Christina <cramos@steptoe.com>
Subject: NFN8 Discovery

Chris and Austin,

Per the Court's order yesterday, I attach requests for production and interrogatories. As you will note from the attached, Plaintiffs continue to seek information regarding the same general topics covered in their informal proposals to Defendants and the Draft Proposed Order accompanying their Motion. As the Court expressly recognized in its November 5 Order, the general topics covered in Plaintiffs more detailed previous proposals are central to the matters at issue in the upcoming preliminary injunction hearing. At the same time, please note that, relative to Plaintiffs' prior detailed proposals, Plaintiffs' court-authorized discovery requests seek considerably less-detailed

information in connection with most of those general topics. Plaintiffs have pared down their requests to ensure that they are receiving sufficient information to evaluate Defendants' business and financial status while simultaneously ensuring that Defendants can comply with their requests quickly and efficiently.

Given the Court's timetable of November 2022 as the close of discovery, we have requested this data by November 15. That will allow us to take depositions the week of November 18. Please let me know what days your clients are available for depositions that week. We have keep an interrogatory and an RFP in reserve if we need it to follow up from information that you provide, particularly with respect to the crypto wallets.

The Court has also ordered that your clients provide the following the past three years of bank statements (which we view as including brokerage statements), identification of cryptocurrency wallets, and identification of NFN8's accountants. Because this information should be readily available (and given the tight deadlines), we've asked for this information by Friday, November 8.

Please let me know if you have any questions.

Best regards,

David

David Isaak
Partner



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